

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EASYTEX CORPORATION LIMITED,	:	ECF CASE
Plaintiff,	:	07 CV 3907 (BSJ) (JCF)
-against-	:	
PETER & FRANK OF NY, CORP., CHUL	:	NOTICE OF MOTION FOR SUMMARY
KYU KIM a/k/a KIM CHUL KYU a/k/a	:	JUDGMENT AND OTHER RELIEF BY
CHUK CHUL KIM a/k/a ROBERT CHUL	:	<u>AMERICAN INTERNATIONAL LINE</u>
KIM a/k/a CHUL KYOO KIM a/k/a	:	
CHULKYOO KIM a/k/a KIM K. CHUL,	:	
BARO SHIPPING CO., LTD., TOP TEN	:	
TRANS, INC., GFA, INC., 3 WIN INC.,	:	
MERCURY, AMERICAN INTERNATIONAL	:	
LINE, INC., SOON CHAN HONG a/k/a	:	
SOON C. HONG a/k/a SOONCHAN C.	:	
HONG a/k/a SOON CHAN HONG a/k/a	:	
CHAN S. HONG a/k/a HONG S. CHAN	:	
a/k/a HONG SOON CHANG d/b/a	:	
SOONCHAN HONG CUSTOM HOUSE	:	
BROKER, STOP & STOR, NEXXON	:	
TRADING, INC., SOLUTION USA, INC.,	:	
GAVIN FASHION, INC., KOREA	:	
EXPRESS USA, JKM USA, CORP.,	:	
WESTY STORAGE CENTERS, jointly and severally,	:	
Defendants.	:	

PLEASE TAKE NOTICE that upon the annexed declarations of Yoona Choi and Carl E. Person, Rule 56.1 Statement, Memorandum of Law by American International Line, Inc. in Support of Its Motion for Summary Judgment; Posting of a Bond by Plaintiff under Local Civil Rule 54.2; and a Stay of Proceedings Pending Decision on this Motion, and all prior papers and proceedings, the Defendant, **American International Line, Inc.** (hereinafter, "American"), the undersigned attorney will make a motion before the Honorable Barbara S. Jones, United States District Court for the Southern District of New York, located at 500 Pearl Street, New York, New

York 10007, Courtroom 18B, on the 9th day of September, 2008, at 9:30 a.m., or as soon thereafter as counsel can be heard, for an order

- (i) pursuant to Rule 56, F.R.Civ.P., granting summary judgment to American, together with attorneys' fees and costs;
- (ii) pursuant to Local Civil Rule 54.2, requiring Plaintiff to post a bond in the amount of \$500,000 as security for costs and sanctions that may be awarded to the remaining co-defendants, including American;
- (iii) staying all proceedings in this action until the Plaintiff has posted the bond in the amount to be determined by the Court; and
- (iv) for such other and further relief which the Court deems just and proper.

Dated: New York, New York
August 21, 2008



Carl E. Person (CP 7637)
Attorney for Defendant, American
International Line, Inc.
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CERTIFICATE OF SERVICE

It is hereby certified that on August 21, 2008 a true and correct copy of the foregoing Notice of Motion for Summary Judgment by American International Line was served on the respective attorneys for the Plaintiff and Co-Defendants by causing the same to be delivered by first class mail, postage pre-paid to:

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Dated: August 21, 2008

Carl E. Person (CP 7637)